

# **China New Higher Education Group**

## **Privacy Declaration**

Protecting your personal information and privacy is one of our important responsibilities. This Policy explains how the information systems of China New Higher Education Group collect, use, store and protect your personal information, as well as the relevant rights you enjoy.

### **I. Scope of Application**

This Privacy Policy applies to all services provided by the information systems of China New Higher Education Group. By using the information systems of China New Higher Education Group, you indicate that you have read, understood and agreed to all contents of this Policy.

### **II. Information Collection and Use**

#### **(I) Information Collection**

The information systems of China New Higher Education Group collect your personal information strictly in accordance with the Personal Information Protection Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Cybersecurity Law of the People's Republic of China and other laws and regulations, following the

principles of legitimacy, propriety, necessity and good faith. We only collect information necessary for realizing service functions, including but not limited to:

1. Identity information: name, ID number and other information used for identity verification.
2. Contact information: telephone number, e-mail address, postal address, etc.
3. Business information: business data and records generated when you use various functions of the systems.
4. Technical information: system logs, access records and other data used for system operation, maintenance and security protection.

## **(II) Information Use**

We will use your personal information strictly for the purposes explicitly stated at the time of collection and will not use it beyond such scope. The main purposes include:

1. Provision of services: providing you with services such as identity verification, business handling and information inquiry.

2. System maintenance: used for system operation and maintenance, function optimization and security assurance.

3. Legal obligations: submitting information to competent authorities or cooperating with investigations in accordance with laws and regulations.

Without your explicit consent, we will not use your personal information for other purposes, nor will we sell, rent or otherwise provide your personal information to any third party for commercial purposes.

### **(III) Cookie Technology**

Web-based systems only use necessary session cookies to maintain normal browsing functions. Such cookies will be automatically deleted after you close your browser and will not retain any personal identification information. We do not use cookies for cross-site tracking or user profiling.

If you wish to disable cookies, you may manage them through your browser settings, though this may affect the normal use of some page functions.

### **III. Information Protection Measures**

We adopt security technical and management measures meeting national standards to protect the security of your personal information:

#### **(I) Technical Measures**

1. Data encryption: encrypt storage and transmission of sensitive information using encryption algorithms, including national cryptographic algorithms (SM2/SM3/SM4) or internationally recognized high-strength encryption algorithms (such as AES-256, RSA-2048 or above).
2. Access control: implement strict identity authentication and permission management to ensure that only authorized personnel can access relevant data.
3. Secure transmission: adopt secure protocols such as HTTPS for data transmission to prevent data theft or tampering.
4. Regular backup: implement a data backup mechanism to ensure data recoverability.
5. Security audit: record data access and operation logs and conduct regular security audits.

6. We will retain your personal information only for the period necessary to fulfill the purposes of collection, unless otherwise stipulated by laws and regulations.

## **(II) Management Measures**

1. Institutional norms: establish complete data protection management systems and operating procedures.

2. Personnel management: provide data protection training for staff and require them to sign confidentiality agreements.

3. Risk assessment: conduct regular data security risk assessments to identify and eliminate hidden dangers in a timely manner.

4. Emergency response: handle security incidents promptly in accordance with the emergency response plan for security incidents.

## **(III) Physical Measures**

Servers are deployed in computer rooms meeting national standards, equipped with access control, monitoring, fire prevention, temperature control and other security facilities.

## **IV. Information Sharing and Disclosure**

We may share necessary personal information with our affiliated companies to provide and develop our services. Except for the following circumstances, we and our affiliated companies will not share your personal information with any third party without your consent:

1. In accordance with the provisions of laws and regulations or the requirements or authorization of competent authorities, administrative or judicial bodies;

2. When sharing data with third parties for business operation needs, we will comply with the following requirements:

- (1) Select third-party service providers with corresponding qualifications and security capabilities.

- (2) Sign agreements to clarify the data protection obligations and liability for breach of contract of third parties.

- (3) Regularly review the data protection measures of third parties.

## **V. Your Rights**

According to law, you enjoy the following rights with respect to your personal information:

1. Right to know: the right to be informed of how we process your personal information.
2. Right to access: the right to access your personal information held by us.
3. Right to correction: the right to request the correction of inaccurate or incomplete personal information.
4. Right to deletion: the right to request the deletion of your personal information under specific circumstances.
5. Right to withdraw consent: the right to withdraw your consent at any time.
6. Other rights stipulated by law.

## **VI. Security Event Notification**

In the unfortunate event of a security incident such as leakage, tampering or loss of personal information, China New Higher Education Group will immediately activate the

emergency response plan, take remedial measures, and notify you within 72 hours via SMS, email, telephone, public notice or other means, informing you of the incident details, measures taken and preventive steps you may take. We will also report to the competent authorities in accordance with laws and regulations. You may also contact China New Higher Education Group (Contact information: <https://www.xingaojiao.com/lxwm.html>).

## **VII. Updates to the Privacy Policy**

We may revise this Privacy Policy from time to time according to changes in laws and regulations or business development needs. If you do not agree with the revised content, you may stop using the information systems of China New Higher Education Group; continued use shall be deemed as acceptance of the revised Privacy Policy.

## **VIII. Dispute Resolution**

The conclusion, effectiveness, performance, interpretation and dispute resolution of this Privacy Policy shall be governed by the laws of the People's Republic of China. Any dispute shall

be resolved through friendly consultation between both parties;  
if consultation fails, either party may file a lawsuit with the  
people's court having jurisdiction over the domicile of China  
New Higher Education Group within the territory of China.

We are committed to strictly abiding by national laws and  
regulations and effectively protecting the security of your  
personal information and privacy rights. Your trust is the driving  
force for our continuous progress!

**China New Higher Education Group Ltd.**

**March 10, 2026**